



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

WMP/ALC/LHE/SME
F. #2016R00505

*271 Cadman Plaza East
Brooklyn, New York 11201*

January 26, 2017

By ECF and Email

Andrew J. Levander, Esq.
Dechert LLP
1095 Avenue of the Americas
New York, New York 10036

Michael S. Sommer, Esq.
Wilson Sonsini Goodrich & Rosati P.C.
1301 Avenue of the Americas, 40th Floor
New York, New York 10019

Gregory J. O'Connell, Esq.
De Feis O'Connell & Rose, P.C.
500 Fifth Avenue, Suite 2630
New York, New York 10110

Kevin J. O'Brien, Esq.
Ford O'Brien LLP
85 Broad Street, 28th floor
New York, New York 10004

Jonathan S. Sack, Esq.
Morvillo, Abramowitz, Grand, Iason &
Silberberg P.C.
565 Fifth Avenue
New York, New York 10017

Seth L. Levine, Esq.
Levine Lee LLP
650 Fifth Avenue, 13th Floor
New York, New York 10019

F. Andino Reynal, Esq.
Fertitta Reynal LLP
815 Travis Street, Suite 1553
Houston, Texas 77002

Re: United States v. Mark Nordlicht, et al.
Criminal Docket No. 16-640 (DLI)

Dear Counsel:

Enclosed please find the government's discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This disclosure supplements the government's earlier disclosure by letter dated January 23, 2017. The government again requests reciprocal discovery from the defendants.

Attached are the warrant and agent affidavit in connection with the search executed at the offices of Platinum Partners ("Platinum") on June 22, 2016 (Bates stamped

Defense Counsel
January 26, 2017
Page 2

EDNY-PP-SW-000000001 to EDNY-PP-SW-000000033). Additionally, the government has made available at First Choice Copy ("First Choice"), for reproduction to the defendants, emails pertaining to the following custodians that were recovered through the search executed at Platinum's offices:

- David Levy: EDNY-PP-SW1-000000001 to EDNY-PP-SW1-000569241
- Mark Nordlicht: EDNY-PP-SW1-000569242 to EDNY-PP-SW1-001356665
- David Levy: EDNY-PP-SW1-001356666 to EDNY-PP-SW1-001636359

You may obtain copies of the materials listed above by contacting Joseph Meisner at First Choice at 718-381-1480, extension 212, and referencing the print order number provided by email. First Choice is located at 52-08 Grand Avenue, Maspeth, New York 11378.

Very truly yours,

ROBERT L. CAPERS
United States Attorney
Eastern District of New York

By: /s/
Winston M. Paes
Alicyn L. Cooley
Lauren H. Elbert
Sarah M. Evans
Assistant U.S. Attorneys
(718) 254-6023 (Paes)

Enclosures

cc: Clerk of the Court (DLI) (by ECF) (w/o enclosures)